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12 UNITED STATES DISTRICT COURT
13 FOR THE CENTRAL DISTRICT OF CALIFORNIA
14

15 AMERICAN CIVIL LIBERTIES
UNION FOUNDATION OF
16 SOUTHERN CALIFORNIA,

17 Plaintiff,

18 v.

19 UNITED STATES IMMIGRATION
AND CUSTOMS ENFORCEMENT, et
20 al.,

21 Defendants.
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No. 2:22-cv-04760-SHK

**DEFENDANT DEPARTMENT OF
HOMELAND SECURITY'S NOTICE
OF FILING SECOND
SUPPLEMENTAL DECLARATION OF
CATRINA M. PAVLIK-KEENAN**

(Filed concurrently with Second
Supplemental Declaration of Katrina M.
Pavlik-Keenan)

Hearing Date: To Be Set By The Court

Honorable Shashi H. Kewalramani
United States Magistrate Judge

TO THE COURT, ALL PARTIES AND THEIR COUNSEL OF RECORD:

Defendant Department of Homeland Security (“DHS”) hereby submits the following Second Supplemental Declaration of Catrina M. Pavlik-Keenan, attached hereto as Exhibit 1, in support of Defendant’s Opposition to Plaintiff’s Motion to Enforce [Dkt. 128].

As explained in the Second Supplemental Declaration, DHS-FOIA was able to reduce the number of potentially responsive pages following DHS-FOIA’s search for OCIO records in response to Plaintiff’s FOIA request to 1,399 pages. DHS-FOIA now plans to immediately begin processing these records on a rolling basis at a rate of 700 pages per month consistent with its present processing rate and ability, with the first production and response expected on July 7, 2025. DHS-FOIA plans to complete processing of the responsive records no later than August 4, 2025.

Dated: June 10, 2025

Respectfully submitted,

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